

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Bomarko, Inc.
1955 North Oak Road
Plymouth, Indiana 46563**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T099-7713-00021	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary waxed and coated paper and foil roll and sheeted stock manufacturing operation.

Responsible Official: Kimball L. Mancke, President/Chief Operating Officer
Source Address: 1955 North Oak Road, Plymouth, Indiana 46563
Mailing Address: P.O. Box K, Plymouth, Indiana 46563
SIC Code: 2671
County Location: Marshall
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) one (1) flexographic rotogravure printing press (ID No. 1-2-P1), with a maximum line speed of 600 feet per minute and a maximum printing width of 50 inches, exhausting through one (1) stack (ID No. 1-2-P1-1);
- (2) one (1) flexographic rotogravure printing press (ID No. 1-2-P2), with a maximum line speed of 600 feet per minute and a maximum printing width of 50 inches, exhausting through one (1) stack (ID No. 1-2-P2-1);
- (3) one (1) rotogravure printing press (ID No. 1-2-P3), with a maximum line speed of 800 feet per minute and a maximum printing width of 45 inches, exhausting through two (2) stacks (ID Nos. 1-2-P3-1 and 1-2-P3-2);
- (4) one (1) rotogravure printing press (ID No. 1-2-P4), with a maximum line speed of 600 feet per minute and a maximum printing width of 45 inches, exhausting through three (3) stacks (ID Nos. 1-2-P4-1, 1-2-P4-2, and 1-2-P4-3);
- (5) one (1) rotogravure printing press (ID No. 1-2-P5), with a maximum line speed of 1,200 feet per minute and a maximum printing width of 44 inches, exhausting through one (1) stack (ID No. 1-2-P5-1);
- (6) one (1) packaging rotogravure printing press (ID No. 1-2-P6), with a maximum line speed of 800 feet per minute and a maximum printing width of 32 inches, with a catalytic incinerator for VOC control, exhausting through one (1) stack (ID No. 1-3-INC-1);
- (7) one (1) flexographic printing press (ID No. 1-2-P7), with a maximum line speed of 800 feet per minute and a maximum printing width of 50 inches, exhausting through two (2) stacks (ID Nos. 1-2-P7-1 and 1-2-P7-2);
- (8) one (1) rotogravure printing press (ID No. 1-2-P8), with a maximum line speed of 800 feet per minute and a maximum printing width of 45 inches, exhausting through one (1) stack (ID No. 1-2-P8-1);
- (9) one (1) flexographic printing press (ID No. 1-2-P9), with a maximum line speed of 800 feet per minute and a maximum printing width of 50 inches, exhausting through one (1) stack (ID No. 1-2-P9-1); and

- (10) one (1) paper-fired boiler (ID No. 1-1A-J), also burning natural gas at a maximum heat input rate of 3.0 million British thermal units (MMBtu) per hour, with a woven fiberglass fabric baghouse for PM control, exhausting through one (1) stack (ID No. 1-1A-J-1).

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour including:
 - (a) one (1) hot water boiler, rated at 0.164 MMBtu per hour;
 - (b) two (2) hot water boilers, each rated at 0.66 MMBtu per hour;
 - (c) one (1) boiler, rated at 2.14 MMBtu per hour;
 - (d) one (1) hot water boiler, rated at 2.58 MMBtu per hour; and
 - (e) one (1) boiler, rated at 1.5 MMBtu per hour.
- (2) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 including:
 - (a) one (1) Safety Kleen cold parts cleaner.
- (3) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22); and
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

(b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
 - (5) Any insignificant activity that has been added without a permit revision; and
 - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

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- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation; or
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due. [326 IAC 2-5-3]
 - (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

- (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
- (2) The Permittee, and IDEM, OAM acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential to emit of VOC is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAM prior to making the change.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period, as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9, or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor), in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control

The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.12 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.14 Temperature Monitoring Device Specifications

Whenever a condition in this permit requires the measurement of temperature in the gas stream immediately before and after the catalyst bed of the catalytic incinerator, the temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade ($\pm 0.5^{\circ}\text{C}$), whichever is more accurate.

C.15 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.16 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 13, 1996.
- (b) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

- (c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (e) Upon direct notification by IDEM, OAM that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.17 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.18 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

- (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.19 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.20 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.

C.21 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.22 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;

- (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.23 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.24 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (1) one (1) flexographic rotogravure printing press (ID No. 1-2-P1), with a maximum line speed of 600 feet per minute and a maximum printing width of 50 inches, exhausting through one (1) stack (ID No. 1-2-P1-1);
- (2) one (1) flexographic rotogravure printing press (ID No. 1-2-P2), with a maximum line speed of 600 feet per minute and a maximum printing width of 50 inches, exhausting through one (1) stack (ID No. 1-2-P2-1);
- (3) one (1) rotogravure printing press (ID No. 1-2-P3), with a maximum line speed of 800 feet per minute and a maximum printing width of 45 inches, exhausting through two (2) stacks (ID Nos. 1-2-P3-1 and 1-2-P3-2);
- (4) one (1) rotogravure printing press (ID No. 1-2-P4), with a maximum line speed of 600 feet per minute and a maximum printing width of 45 inches, exhausting through three (3) stacks (ID Nos. 1-2-P4-1, 1-2-P4-2, and 1-2-P4-3);
- (5) one (1) rotogravure printing press (ID No. 1-2-P5), with a maximum line speed of 1,200 feet per minute and a maximum printing width of 44 inches, exhausting through one (1) stack (ID No. 1-2-P5-1);
- (6) one (1) packaging rotogravure printing press (ID No. 1-2-P6), with a maximum line speed of 800 feet per minute and a maximum printing width of 32 inches, with a catalytic incinerator for VOC control, exhausting through one (1) stack (ID No. 1-3-INC-1);
- (7) one (1) flexographic printing press (ID No. 1-2-P7), with a maximum line speed of 800 feet per minute and a maximum printing width of 50 inches, exhausting through two (2) stacks (ID Nos. 1-2-P7-1 and 1-2-P7-2);
- (8) one (1) rotogravure printing press (ID No. 1-2-P8), with a maximum line speed of 800 feet per minute and a maximum printing width of 45 inches, exhausting through one (1) stack (ID No. 1-2-P8-1); and
- (9) one (1) flexographic printing press (ID No. 1-2-P9), with a maximum line speed of 800 feet per minute and a maximum printing width of 50 inches, exhausting through one (1) stack (ID No. 1-2-P9-1).

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-5-5] [326 IAC 2-2]

Pursuant to 326 IAC 8-5-5, the Permittee may not cause, allow, or permit the operation of Presses 1-2-P3, 1-2-P4, 1-2-P5, 1-2-P6, 1-2-P7, 1-2-P8, and 1-2-P9 employing solvent-containing ink unless:

- (a) the volatile fraction of the ink, as it is applied to the substrate, contains 25% by volume or less of volatile organic compound (VOC) and 75% by volume or more of water; or
- (b) the ink as it is applied to the substrate, less water, contains 60% by volume or more nonvolatile material; or
- (c) the owner or operator installs and operates:
 - (1) a carbon adsorption system that reduces the VOC emissions from the capture system by at least 90% by weight;
 - (2) an incineration system that oxidizes at least 90% of the nonmethane VOC to carbon dioxide and water; or
 - (3) an alternative VOC emission reduction system demonstrated to have at least a 90% reduction efficiency, measured across the control system, and has been approved by the commissioner; or
- (d) for packaging rotogravure and flexographic printing processes, the ink, as applied to the substrate, meets an emission limit of 0.5 pound of VOC per pound of solids in the ink.

- (e) A capture system must be used in conjunction with the emission control systems specified in paragraph (c) above. The capture system shall attain an efficiency sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of:
 - (1) seventy-five percent (75%) for publication rotogravure processes;
 - (2) sixty-five percent (65%) for packaging rotogravure processes; and
 - (3) sixty percent (60%) for flexographic printing processes.
- (f) A catalytic incinerator shall be used to control VOC emissions from the packaging rotogravure Press 6 (ID No. 1-2-P6) to comply with 326 IAC 8-5-5, and shall maintain at least a 90% VOC destruction efficiency as per (c)(2) above, and a 65% overall control efficiency as per (e)(2) above. Any of the other compliance methods listed in paragraphs (a) through (e) above may be used to achieve compliance with 326 IAC 8-5-5 for Press 6 as an alternative to the use of the catalytic incinerator.
- (g) To ensure that the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) do not apply, the input of VOC to the nine (9) presses and the usage of cleanup solvent for the nine (9) presses [the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent] shall be limited to 239.65 tons used per 12 consecutive months period. This limitation will prevent the VOC emissions from the entire source being greater than 249 tons per year.

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

During the periods specified in condition D.1.4 below, after issuance of this permit, the Permittee shall perform VOC testing on the catalytic incinerator, controlling VOC emissions from Press 6 (ID No. 1-2-P6), utilizing Method 25, or other methods as approved by the Commissioner to determine the operating parameters necessary to show compliance with Condition D.1.1. This test shall be repeated at least once every thirty (30) months from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-12]

- (a) Pursuant to 326 IAC 8-1-12, by May 1, 1997, or upon startup of a new coating facility, or upon changing the method of compliance for an existing coating facility, the Permittee shall comply with the following requirements:
 - (1) Control system operation, maintenance, and testing requirements for Press 6 (ID No. 1-2-P6) shall be as follows:
 - (A) The control system shall be operated and maintained according to the manufacturer's recommendations but may be modified based on the results of the initial or subsequent compliance test or upon the written request of the department.

- (B) A copy of the operating and maintenance procedures shall be maintained in a convenient location at the source property and as close to the control system as possible for reference by plant personnel and department inspectors.
- (C) The control system shall be tested according to the following schedule and in the following situations:
 - (i) An initial compliance test shall be conducted. Compliance tests shall be conducted no later than every thirty (30) months after the date of the initial test.
 - (ii) A compliance test shall be conducted whenever the owner or operator chooses to operate a control system under conditions different from those that were in place at the time of the previous test.
 - (iii) A compliance test shall be performed within ninety (90) days of:
 - (AA) startup of a new coating facility;
 - (BB) changing the method of compliance for an existing coating facility from compliant coatings or daily-weighted averaging to control devices; or
 - (CC) receipt of a written request from the department or the U.S. EPA.
- (D) All compliance tests shall be conducted according to a protocol approved by the department at least thirty (30) days before the test. The protocol shall contain, at a minimum, the following information:
 - (i) Test procedures.
 - (ii) Operating and control system parameters.
 - (iii) Type of VOC containing process material being used.
 - (iv) The process and control system parameters that will be monitored during the test.

D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.6 Volatile Organic Compounds (VOC)

The catalytic incinerator for VOC control shall be in operation at all times when Press 6 (ID No. 1-2-P6) is in operation unless an alternative compliance method as listed in 326 IAC 8-5-5(c) is used to comply with the requirements of 326 IAC 8-5-5.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-12] [326 IAC 8-5-5]

Monitoring equipment requirements for Press 6 (ID No. 1-2-P6) shall be as follows:

- (a) Since a catalytic incinerator is used for VOC reduction, a temperature device capable of continuously recording the temperature in the gas stream immediately before and after the catalyst bed of the incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees

Centigrade, or plus or minus five-tenths degree Centigrade ($\pm 0.5^{\circ}\text{C}$), whichever is more accurate. The oxidizing zone minimum temperature shall be 550°F .

- (b) Measure and record each day the air flow rate through the catalytic incinerator to ensure the capture efficiency of the incinerator meets the minimum required capture efficiency required in Condition D.1.1.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below for each press. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each day;
 - (4) The cleanup solvent usage for each day;
 - (5) The total VOC usage for each day; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) Pursuant to 326 IAC 8-1-12(c), on and after May 1, 1997, or on and after startup of a new coating facility, or upon changing the method of compliance for an existing coating facility from the use of compliant coatings or daily-weighted averaging to control devices, the Permittee shall collect and record each day and maintain all of the following information each day for Press 6 (ID No. 1-2-P6):
 - (1) The name and identification number of each coating used at the coating facility.
 - (2) The mass of VOC per unit volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating expressed in units necessary to determine compliance, used each day at the coating facility.
 - (3) The maximum VOC content (mass of VOC per unit volume of coating solids, as applied) or the daily-weighted average VOC content (mass of VOC per unit volume of coating solids, as applied) of the coatings used each day on the coating facility.
 - (4) The required overall emission reduction efficiency for each day for the coating facility.
 - (5) The actual overall emission reduction efficiency achieved for each day for the coating facility as determined during the compliance test required by 326 IAC 8-1-12(b)(1)(C).

- (6) Control device monitoring data as follows:
 - (A) For catalytic incinerators, the following:
 - (i) Continuous records of the temperature of the gas stream both upstream and downstream of the catalyst bed of the incinerator.
 - (ii) Records of all three (3) hour periods of operation in which the average temperature measured at the process vent stream immediately before the catalyst bed is more than fifty degrees Fahrenheit (50°F) (twenty-eight degrees Centigrade (28°C)) below the average temperature of the process vent stream that existed during the most recent test that demonstrated that the coating facility was in compliance.
 - (iii) Records of all three (3) hour periods of operation in which the average temperature difference across the catalyst bed is less than eighty percent (80%) of the temperature difference measured during the most recent test that demonstrated that the coating facility was in compliance.
 - (7) A log of operating time for the capture system, control device, monitoring equipment, and the associated coating facility.
 - (8) A maintenance log for the capture system, control device, and monitoring equipment detailing all routine and nonroutine maintenance performed including dates and duration of any outages.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

- (a) Pursuant to 326 IAC 8-1-12(d), on and after May 1, 1997, the Permittee shall notify the department in either of the following instances for Press 6 (ID No. 1-2-P6):
 - (1) Any record showing noncompliance with the applicable requirements for control devices shall be reported by submitting a copy of the record to the department within thirty (30) days following noncompliance; such record shall also be submitted with the quarterly compliance report. The following information shall accompany each submittal:
 - (A) Name and location of the coating facility.
 - (B) Identification of the control system where the noncompliance occurred and the coating facility it served.
 - (C) Time, date, and duration of the noncompliance.
 - (D) Corrective action taken.
 - (2) At least thirty (30) calendar days before changing the method of compliance from control devices to the use of compliant coatings or daily-weighted averaging, the owner or operator shall comply with all applicable requirements of 326 IAC 8-1-10(b) or 326 IAC 8-1-11(b), respectively. Upon changing the method of compliance from control devices to the use of compliant coatings or daily-weighted averaging, the owner or operator shall comply with all requirements of 326 IAC 8-1-10 or 326 IAC 8-1-11, respectively, applicable to the coating facility subject to 326 IAC 8-5-5.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (10) one (1) paper-fired boiler (ID No. 1-1A-J), also burning natural gas at a maximum heat input rate of 3.0 million British thermal units (MMBtu) per hour, with a woven fiberglass fabric baghouse for PM control, exhausting through one (1) stack (ID No. 1-1A-J-1).

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (c)), particulate emissions from the 3.0 MMBtu per hour paper and natural gas fired boiler shall not exceed 0.59 pound per MMBtu heat input based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}} \quad \text{where: } Pt = \text{Pounds of particulate matter emitted per MMBtu heat input.}$$

Q = Total source maximum operating capacity rating in MMBtu per hour.

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.3 Particulate Matter (PM)

The baghouse for PM control shall be in operation at all times when the 3.0 MMBtu per hour paper and natural gas fired boiler is in operation and burning paper for fuel. It is not necessary for the baghouse to be in operation when the boiler is burning only natural gas for fuel.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.4 Visible Emissions Notations

- (a) Daily visible emission notations of the 3.0 MMBtu per hour paper-fired boiler stack exhaust shall be performed during normal daylight operations when burning paper and exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the 3.0 MMBtu per hour paper-fired boiler, at least once daily when the 3.0 MMBtu per hour paper-fired boiler is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 0.1 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.2.6 Broken or Failed Bag Detection

In the event that bag failure has been observed.

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.7 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the 3.0 MMBtu per hour paper-fired boiler stack exhaust.
- (b) To document compliance with Condition D.2.5, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle: frequency and differential pressure.

- (2) Documentation of all response steps implemented, per event .
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour including:
 - (a) one (1) hot water boiler, rated at 0.164 MMBtu per hour;
 - (b) two (2) hot water boilers, each rated at 0.66 MMBtu per hour;
 - (c) one (1) boiler, rated at 2.14 MMBtu per hour;
 - (d) one (1) hot water boiler, rated at 2.58 MMBtu per hour; and
 - (e) one (1) boiler, rated at 1.5 MMBtu per hour.
- (2) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 including:
 - (a) one (1) Safety Kleen cold parts cleaner.

Boilers

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating), particulate matter emissions from each of the 0.164 MMBtu per hour hot water boiler, the two (2) 0.66 MMBtu per hour hot water boilers, the 2.14 MMBtu per hour boiler, and the 2.58 MMBtu per hour hot water boiler shall in no case exceed 0.6 pounds per MMBtu heat input.

D.3.2 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (c)), particulate emissions from the 1.5 MMBtu per hour boiler shall not exceed 0.59 pound per MMBtu heat input based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}} \quad \text{where: } Pt = \text{Pounds of particulate matter emitted per MMBtu heat input.}$$

$Q = \text{Total source maximum operating capacity rating in MMBtu per hour.}$

Compliance Determination Requirement

D.3.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limits specified in Conditions D.3.1 and D.3.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Degreasing operations

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.4 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;

- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Bomarko, Inc.
Source Address: 1955 North Oak Road, Plymouth, Indiana 46563
Mailing Address: P.O. Box K, Plymouth, Indiana 46563
Part 70 Permit No.: T099-7713-00021

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Bomarko, Inc.
Source Address: 1955 North Oak Road, Plymouth, Indiana 46563
Mailing Address: P.O. Box K, Plymouth, Indiana 46563
Part 70 Permit No.: T099-7713-00021

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
9	1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9	2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
 QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Bomarko, Inc.
 Source Address: 1955 North Oak Road, Plymouth, Indiana 46563
 Mailing Address: P.O. Box K, Plymouth, Indiana 46563
 Part 70 Permit No.: T099-7713-00021

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____
 Title/Position: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: Bomarko, Inc.
Source Location: 1955 North Oak Road, Plymouth, Indiana 46563
County: Marshall
SIC Code: 2671
Operation Permit No.: T099-7713-00021
Permit Reviewer: Trish Earls/EVP

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Bomarko, Inc. relating to the operation of a waxed and coated paper and foil roll and sheeted stock manufacturing operation.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (1) one (1) flexographic rotogravure printing press (ID No. 1-2-P1), with a maximum line speed of 500 feet per minute and a maximum printing width of 43.9 inches, exhausting through one (1) stack (ID No. 1-2-P1-1);
- (2) one (1) flexographic rotogravure printing press (ID No. 1-2-P2), with a maximum line speed of 500 feet per minute and a maximum printing width of 43.9 inches, exhausting through one (1) stack (ID No. 1-2-P2-1);
- (3) one (1) rotogravure printing press (ID No. 1-2-P3), with a maximum line speed of 600 feet per minute and a maximum printing width of 45 inches, exhausting through two (2) stacks (ID Nos. 1-2-P3-1 and 1-2-P3-2);
- (4) one (1) rotogravure printing press (ID No. 1-2-P4), with a maximum line speed of 600 feet per minute and a maximum printing width of 45 inches, exhausting through three (3) stacks (ID Nos. 1-2-P4-1, 1-2-P4-2, and 1-2-P4-3);
- (5) one (1) rotogravure printing press (ID No. 1-2-P5), with a maximum line speed of 800 feet per minute and a maximum printing width of 44 inches, exhausting through one (1) stack (ID No. 1-2-P5-1);
- (6) one (1) packaging rotogravure printing press (ID No. 1-2-P6), with a maximum line speed of 600 feet per minute and a maximum printing width of 32 inches, with a catalytic incinerator for VOC control, exhausting through one (1) stack (ID No. 1-3-INC-1);
- (7) one (1) flexographic printing press (ID No. 1-2-P7), with a maximum line speed of 800 feet per minute and a maximum printing width of 43.9 inches, exhausting through two (2) stacks (ID Nos. 1-2-P7-1 and 1-2-P7-2);
- (8) one (1) rotogravure printing press (ID No. 1-2-P8), with a maximum line speed of 600 feet per minute and a maximum printing width of 45 inches, exhausting through one (1) stack (ID No. 1-2-P8-1);
- (9) one (1) flexographic printing press (ID No. 1-2-P9), with a maximum line speed of 600 feet per minute and a maximum printing width of 43.9 inches, exhausting through one (1) stack (ID No. 1-2-P9-1); and

- (10) one (1) paper-fired boiler (ID No. 1-1A-J), also burning natural gas at a maximum heat input rate of 3.0 million British thermal units (MMBtu) per hour, with a woven fiberglass fabric baghouse for PM control, exhausting through one (1) stack (ID No. 1-1A-J-1).

Note: Printing press No. 10 is no longer in operation at this source.

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Requiring ENSR

There are no new facilities to be reviewed under the ENSR process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour including:
 - (a) one (1) hot water boiler, rated at 0.164 MMBtu per hour;
 - (b) two (2) hot water boilers, each rated at 0.66 MMBtu per hour;
 - (c) three (3) air rotation units, each rated at 0.32 MMBtu per hour;
 - (d) two (2) extruder primer drying ovens, each rated at 0.80 MMBtu per hour;
 - (e) one (1) hot oil heater, rated at 1.08 MMBtu per hour;
 - (f) one (1) boiler, rated at 2.14 MMBtu per hour;
 - (g) one (1) hot water boiler, rated at 2.58 MMBtu per hour;
 - (h) eleven (11) unit heaters, each rated at 0.30 MMBtu per hour;
 - (i) ten (10) press oven burners (ID Nos. P1 - P10), each rated at 0.8, 0.8, 2.8, 4.0, 1.5, 4.0, 1.8, 2.0, 0.8, and 1.2 MMBtu per hour, respectively;
 - (j) one (1) catalytic incinerator, rated at 0.43 MMBtu per hour, used to control VOC emissions from Press No. 6 (ID No. 1-2-P6); and
 - (k) one (1) boiler, rated at 1.5 MMBtu per hour.
- (2) Combustion source flame safety purging on startup.
- (3) VOC and HAP storage containers storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (4) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 including:
 - (a) one (1) Safety Kleen cold parts cleaner.
- (5) Cleaners and solvents characterized as follows:
 - (a) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or;
 - (b) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20°C (68°F);the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (6) Closed loop heating and cooling systems.

- (7) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (8) Noncontact cooling tower systems with forced and induced draft cooling tower system not regulated under a NESHAP.
- (9) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (10) Paved and unpaved roads and parking lots with public access.
- (11) Enclosed conveyor systems for conveying plastic raw materials and plastic finished goods.
- (12) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (13) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.
- (14) On-site fire and emergency response training approved by the department.
- (15) Gasoline emergency generators not exceeding 110 horsepower.
- (16) Other emergency equipment such as stationary fire pumps.
- (17) Purge double block and bleed valves.
- (18) Filter or coalescer media changeout.
- (19) A laboratory as defined in 326 IAC 2-7-1(21)(C).
- (20) The following activities not previously identified with emissions equal to or less than the insignificant thresholds:
 - (a) One (1) foil baler in Plant 1;
 - (b) One (1) paper baler in Plant 1, which exhausts to two (2) small baghouses which vent indoors;
 - (c) One (1) baler in Plant 2;
 - (d) Rewinders;
 - (e) Waxers;
 - (f) One (1) 4,000 gallon ethyl acetate underground storage tank;
 - (g) One (1) 4,000 gallon N-propyl acetate underground storage tank;
 - (h) One (1) 4,000 gallon Isopropyl alcohol underground storage tank;
 - (i) One (1) ink mix room (emissions are accounted for under printing operations);
 - (j) One (1) printing press (Press No. 11) in Plant 2; and
 - (k) One (1) six inch printing press (Press No. 12) in Plant 1.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (1) OP 50-01-85-0105, issued on April 21, 1981;

- (2) Registration Letter, issued on January 9, 1985;
- (3) Registration Letter, issued on January 31, 1986;
- (4) PC (50) 1613. This permit was public noticed on May 29, 1986. However, the permit was voided and the original destroyed according to the policy memo of E.F. Stresino of May 20, 1981.
- (5) Exemption Letter, issued October 30, 1986;
- (6) Registration Letter, issued October 7, 1988;
- (7) Exemption Letter, issued on June 8, 1989;
- (8) Registration CP 099-2195-00021, issued September 26, 1991;
- (9) CP 099-2196-00021, issued January 3, 1992 (Note: this permit was for Press No. 10 which is no longer in service); and
- (10) Exemption No. 099-2305-00021, issued January 14, 1992.

All conditions from previous approvals were incorporated into this Part 70 permit.

Enforcement Issue

- (a) IDEM is aware that some of the inks used in Presses 3 and 4 (ID Nos. 1-2-P3 and 1-2-P4) were not in compliance with the following emission limitation:
 - (1) 326 IAC 8-5-5 (Graphic Arts Operations)
Pursuant to 326 IAC 8-5-5, the owner or operator of a facility subject to this section and employing solvent-containing ink shall not permit the operation of the facility unless:
 - (i) the volatile fraction of the ink, as it is applied to the substrate, contains 25% by volume or less of volatile organic compound (VOC) and 75% by volume or more of water; or
 - (ii) the ink as it is applied to the substrate, less water, contains 60% by volume or more nonvolatile material; or
 - (iii) the owner or operator installs and operates:
 - (A) a carbon adsorption system that reduces the VOC emissions from the capture system by at least 90% by weight;
 - (B) an incineration system that oxidizes at least 90% of the nonmethane VOC to carbon dioxide and water; or
 - (C) an alternative VOC emission reduction system demonstrated to have at least a 90% reduction efficiency, measured across the control system, and has been approved by the commissioner; or
 - (iv) for packaging rotogravure and flexographic printing processes, the ink, as applied to the substrate, meets an emission limit of 0.5 pound of VOC per pound of solids in the ink.
- (b) IDEM is reviewing this matter and has taken appropriate action. The Permittee has stated that it will not operate Presses 3 or 4 (ID Nos. 1-2-P3 and 1-2-P4) unless compliant inks are used.

- (c) The source had the following enforcement actions pending:
- (1) Agreed Order A-1580 in which Bomarko, Inc. was required to:
 - (i) comply with 326 IAC 2-1-3 and 326 IAC 2-1-4,
 - (ii) bring Presses 3 and 4 into compliance with 326 IAC 8-5-5 no later than two (2) years from the effective date of the Agreed Order,
 - (iii) maintain records of the amounts of each ink and solvent used in Presses 3 and 4, as well as the manufacturer's specifications for each batch, to demonstrate compliance with 326 IAC 8-5-5, and
 - (iv) pay a civil penalty in the amount of \$30,000 to the Environmental Management special fund.

The source has stated that it will not operate Presses 3 or 4 (ID Nos. 1-2-P3 and 1-2-P4) unless inks are used that comply with the requirements of 326 IAC 8-5-5.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on December 13, 1996.

A notice of completeness letter was mailed to the source on February 6, 1997.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (3 pages).

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	less than 100
PM-10	less than 100
SO ₂	less than 100
VOC	greater than 250
CO	less than 100
NO _x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

- (a) The potential emissions (as defined in 326 IAC 1-2-55) of VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

- (b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1996 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	7.17
PM-10	--
SO ₂	0.03
VOC	173.92
CO	0.84
NO _x	4.20
HAP	--

County Attainment Status

The source is located in Marshall County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Marshall County has been designated as attainment or unclassifiable for ozone.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) This source is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.430, Subpart QQ), because the printing presses at this source are not publication rotogravure printing presses.

- (b) The Safety Kleen cold parts cleaner, which is an insignificant activity, is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR 63.460 through 63.468, Subpart T) because it does not use a halogenated HAP solvent as a cleaning agent.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on December 13, 1996. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 1-5-2 (Emergency Reduction Plans)

The source has submitted an Emergency Reduction Plan (ERP) on December 13, 1996. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not subject to the requirements of 326 IAC 2-2 because the potential to emit of VOC is less than 250 tons per year, after the application of federally enforceable controls, and the potential to emit of all other regulated pollutants is less than 250 tons per year.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

- (a) Pursuant to 326 IAC 6-2-4 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(c)), particulate emissions from the each of the 3.0 MMBtu per hour paper and natural gas fired boiler and the 1.5 MMBtu per hour boiler shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}} \quad \text{where: } Pt = \text{Pounds of particulate matter emitted per MMBtu heat input.}$$

Q = Total source maximum operating capacity rating in MMBtu per hour.
Q = 7.7 MMBtu/hr (from Insignificant combustion units) + 3.0 MMBtu/hr (from the paper and natural gas fired boiler)
Q = 10.7 MMBtu per hour.

$$Pt = \frac{1.09}{(10.7)^{0.26}} = 0.59 \text{ pound per MMBtu heat input.}$$

Particulate matter emissions from each of the 3.0 MMBtu per hour paper and natural gas fired boiler and the 1.5 MMBtu per hour boiler shall not exceed 0.59 pounds per MMBtu heat input. Controlled particulate matter emissions from the paper and natural gas fired boiler are 0.15 pounds per MMBtu heat input, therefore, this boiler will comply with 326 IAC 6-2-4. The baghouse for control of particulate matter emissions shall be in operation at all times that the boiler is in operation to comply with 326 IAC 6-2-4. Potential particulate matter emissions from the 1.5 MMBtu per hour boiler are less than 0.59 pounds per MMBtu, therefore, this boiler will also comply with 326 IAC 6-2-4.

- (b) Pursuant to 326 IAC 6-2-3 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(b)), particulate matter emissions from each of the 0.164 MMBtu per hour hot water boiler, the two (2) 0.66 MMBtu per hour hot water boilers, the 2.14 MMBtu per hour boiler, and the 2.58 MMBtu per hour hot water boiler, each constructed before September 21, 1983, shall be limited by the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

where: Pt = Pounds of PM emitted per MMBtu heat input.

C = 50 ug/m³ (maximum ground level conc.)

a = plume rise factor = 0.67

h = stack height in feet

= 32 ft. for the 0.164 MMBtu/hr boiler

= 30 ft. for the two (2) 0.66 MMBtu/hr boilers

= 34 ft. for each of the 2.14 and 2.58 MMBtu/hr boilers

Q = Total source maximum operating capacity rating in MMBtu per hour.

Q = 7.7 MMBtu/hr (from Insignificant combustion units) + 3.0 MMBtu/hr (from the paper and natural gas fired boiler)

Q = 10.7 MMBtu per hour.

N = Number of stacks in fuel burning operation.

Based on the above equation, the particulate matter emissions from each of the 0.164 MMBtu per hour hot water boiler, the two (2) 0.66 MMBtu per hour hot water boilers, the 2.14 MMBtu per hour boiler, and the 2.58 MMBtu per hour hot water boiler are limited to 2.4, 2.2, 2.5, and 2.5 pounds per MMBtu of heat input. However, pursuant to 326 IAC 6-2-3(e), particulate matter emissions from any facility used for indirect heating purposes which has 250 MMBtu per hour heat input or less and which began operation after June 8, 1972, shall in no case exceed 0.6 pound per MMBtu heat input. Therefore, since this is the most stringent limit, particulate matter emissions from each of the above listed facilities shall not exceed 0.6 pound per MMBtu heat input. Potential PM emissions from each of these facilities is less than 0.6 pound per MMBtu heat input, therefore, these facilities will comply with 326 IAC 6-2-3.

326 IAC 8-5-5 (Graphic Arts Operations)

- (a) Pursuant to 326 IAC 8-5-5, the ink, as applied to the substrate from the one (1) flexographic rotogravure printing press (1-2-P1), the one (1) flexographic rotogravure printing press (1-2-P2), the one (1) rotogravure printing press (1-2-P3), the one (1) rotogravure printing press (1-2-P4), the one (1) rotogravure printing press (1-2-P5), the one (1) flexographic printing press (1-2-P7), the one (1) rotogravure printing press (1-2-P8), and the one (1) flexographic printing press (1-2-P9), shall have a VOC content equal to or less than 0.5 pound per pound of solids in the ink.

The coatings used in Presses 1 through 5 and 7 through 9 (ID Nos. 1-2-P1 through 1-2-P5, and 1-2-P7 through 1-2-P9) comply with the emission limit of 0.5 pound of VOC per pound of solids in the ink (see Appendix A, page 1 of 3 for compliance calculations).

- (b) Pursuant to 326 IAC 8-5-5, the one (1) packaging rotogravure printing press (1-2-P6) shall operate the catalytic incinerator to have at least a 90% reduction efficiency, measured across the control system, and maintain sixty-five (65) percent capture efficiency.

A catalytic incinerator with at least a 65% overall control efficiency, and at least a 90% VOC destruction efficiency, will be used to control VOC emissions from Press 6 (ID No. 1-2-P6) to comply with this rule.

326 IAC 8-1-12 (Compliance Certification, Record keeping, and Reporting Requirements for Certain Coating Facilities Using Control Devices)

This rule applies to sources that use control devices to comply with VOC emission limits and meet the applicability criteria of 326 IAC 8-5-5(a)(1), 326 IAC 8-5-5(a)(2), or 326 IAC 8-5-5(a)(3)(A). Since this source uses a catalytic incinerator to comply with 326 IAC 8-5-5 for Press 6 (ID No. 1-2-P6) and meets the applicability criteria of 326 IAC 8-5-5(a)(1), it is subject to this rule.

- (a) Pursuant to this rule, by May 1, 1997, or upon startup of a new coating facility, or upon changing the method of compliance for an existing coating facility, the Permittee shall comply with the following requirements:
- (1) Control system operation, maintenance, and testing requirements for Press 6 (ID No. 1-2-P6) shall be as follows:
- (A) The control system shall be operated and maintained according to the manufacturer's recommendations but may be modified based on the results of the initial or subsequent compliance test or upon the written request of the department.
- (B) A copy of the operating and maintenance procedures shall be maintained in a convenient location at the source property and as close to the control system as possible for reference by plant personnel and department inspectors.
- (C) The control system shall be tested according to the following schedule and in the following situations:
- (i) An initial compliance test shall be conducted. Compliance tests shall be conducted no later than every thirty (30) months after the date of the initial test.
- (ii) A compliance test shall be conducted whenever the owner or operator chooses to operate a control system under conditions different from those that were in place at the time of the previous test.
- (iii) A compliance test shall be performed within ninety (90) days of:
- (AA) startup of a new coating facility;
- (BB) changing the method of compliance for an existing coating facility from compliant coatings or daily-weighted averaging to control devices; or
- (CC) receipt of a written request from the department or the U.S. EPA.
- (D) All compliance tests shall be conducted according to a protocol approved by the department at least thirty (30) days before the test. The protocol shall contain, at a minimum, the following information:
- (i) Test procedures.
- (ii) Operating and control system parameters.
- (iii) Type of VOC containing process material being used.
- (iv) The process and control system parameters that will be monitored during the test.

- (2) Monitoring equipment requirements for Press 6 (ID No. 1-2-P6) shall be as follows:
 - (A) Since a catalytic incinerator is used for VOC reduction, a temperature device capable of continuously recording the temperature in the gas stream immediately before and after the catalyst bed of the incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade ($\pm 0.5^{\circ}\text{C}$), whichever is more accurate.

- (b) On and after May 1, 1997, or on and after startup of a new coating facility, or upon changing the method of compliance for an existing coating facility from the use of compliant coatings or daily-weighted averaging to control devices, the Permittee shall collect and record each day and maintain all of the following information each day for each coating facility identified in 326 IAC 8-1-12(a):
 - (1) The name and identification number of each coating used at each coating facility.
 - (2) The mass of VOC per unit volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating expressed in units necessary to determine compliance, used each day at each coating facility.
 - (3) The maximum VOC content (mass of VOC per unit volume of coating solids, as applied) or the daily-weighted average VOC content (mass of VOC per unit volume of coating solids, as applied) of the coatings used each day on each coating facility.
 - (4) The required overall emission reduction efficiency for each day for each coating facility.
 - (5) The actual overall emission reduction efficiency achieved for each day for each coating facility as determined during the compliance test required by 326 IAC 8-1-12(b)(1)(C).
 - (6) Control device monitoring data as follows:
 - (A) For catalytic incinerators, the following:
 - (i) Continuous records of the temperature of the gas stream both upstream and downstream of the catalyst bed of the incinerator.
 - (ii) Records of all three (3) hour periods of operation in which the average temperature measured at the process vent stream immediately before the catalyst bed is more than fifty degrees Fahrenheit (50°F) (twenty-eight degrees Centigrade (28°C)) below the average temperature of the process vent stream that existed during the most recent test that demonstrated that the coating facility was in compliance.
 - (iii) Records of all three (3) hour periods of operation in which the average temperature difference across the catalyst bed is less than eighty percent (80%) of the temperature difference measured during the most recent test that demonstrated that the coating facility was in compliance.
 - (7) A log of operating time for the capture system, control device, monitoring equipment, and the associated coating facility.
 - (8) A maintenance log for the capture system, control device, and monitoring equipment detailing all routine and nonroutine maintenance performed including dates and duration of any outages.

- (c) On and after May 1, 1997, the owner or operator of a coating facility identified in 326 IAC 8-1-12(a) shall notify the department in either of the following instances:

- (1) Any record showing noncompliance with the applicable requirements for control devices shall be reported by submitting a copy of the record to the department within thirty (30) days following noncompliance; such record shall also be submitted with the quarterly compliance report. The following information shall accompany each submittal:
 - (A) Name and location of the coating facility.
 - (B) Identification of the control system where the noncompliance occurred and the coating facility it served.
 - (C) Time, date, and duration of the noncompliance.
 - (D) Corrective action taken.
- (2) At least thirty (30) calendar days before changing the method of compliance from control devices to the use of compliant coatings or daily-weighted averaging, the owner or operator shall comply with all applicable requirements of 326 IAC 8-1-10(b) or 326 IAC 8-1-11(b), respectively. Upon changing the method of compliance from control devices to the use of compliant coatings or daily-weighted averaging, the owner or operator shall comply with all requirements of 326 IAC 8-1-10 or 326 IAC 8-1-11, respectively, applicable to the coating facility subject to 326 IAC 8-5-5.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

The Safety Kleen cold parts cleaner is subject to the requirements of 326 IAC 8-3-2 (Cold Cleaner Operations) because it was constructed after January 1, 1980, and prior to July 1, 1990. Pursuant to this rule, the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

No other 326 IAC Article 8 rules apply.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. Press 6 (ID No. 1-2-P6) has applicable compliance monitoring conditions as specified below:
 - (a) For the catalytic incinerator, controlling VOC emissions, a temperature device capable of continuously recording the temperature in the gas stream immediately before and after the catalyst bed of the incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade ($\pm 0.5^{\circ}\text{C}$), whichever is more accurate.
 - (b) Control device monitoring data shall be collected and recorded each day as follows:
 - (A) For catalytic incinerators, the following:
 - (i) Continuous records of the temperature of the gas stream both upstream and downstream of the catalyst bed of the incinerator.
 - (ii) Records of all three (3) hour periods of operation in which the average temperature measured at the process vent stream immediately before the catalyst bed is more than fifty degrees Fahrenheit (50°F) (twenty-eight degrees Centigrade (28°C)) below the average temperature of the process vent stream that existed during the most recent test that demonstrated that the coating facility was in compliance.
 - (iii) Records of all three (3) hour periods of operation in which the average temperature difference across the catalyst bed is less than eighty percent (80%) of the temperature difference measured during the most recent test that demonstrated that the coating facility was in compliance.
 - (c) Measure and record each day the air flow rate through the catalytic incinerator to ensure the capture efficiency of the incinerator meets the minimum required capture efficiency required by 326 IAC 8-5-5.

These monitoring conditions are necessary because the catalytic incinerator for Press 6 (ID No. 1-2-P6) must operate properly to ensure compliance with 326 IAC 8-5-5 (Graphic Arts Operations), 326 IAC 8-1-12 (Compliance Certification, Record keeping, and Reporting Requirements for Certain Coating Facilities Using Control Devices), and 326 IAC 2-7 (Part 70).

2. The 3.0 MMBtu per hour paper and natural gas fired boiler has applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emissions notations of the 3.0 MMBtu per hour paper-fired boiler stack exhaust shall be performed during normal daylight operations when burning paper and exhausting to the atmosphere. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.
 - (b) The Permittee shall record the total static pressure drop across the baghouse controlling the paper-fired boiler at least once daily when the paper-fired boiler is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 0.1 to 6.0 inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

These monitoring conditions are necessary because the baghouse for the paper-fired boiler must operate properly to ensure compliance with 326 IAC 6-2-4 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(c)) and 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

None of the listed air toxics will be emitted from this source.

Conclusion

The operation of this waxed and coated paper and foil roll and sheeted stock manufacturing operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T099-7713-00021**.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: Bomarko, Inc.
Source Location: 1955 North Oak Road, Plymouth, Indiana 46563
County: Marshall
SIC Code: 2671
Operation Permit No.: T099-7713-00021
Permit Reviewer: Trish Earls/EVP

On October 29, 1998, the Office of Air Management (OAM) had a notice published in the Plymouth Pilot News, Plymouth, Indiana, stating that Bomarko, Inc. had applied for a Part 70 Operating Permit to operate a stationary waxed and coated paper and foil roll and sheeted stock manufacturing operation. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On December 3, 1998, Marjorie Fitzpatrick, of IES Engineers, submitted comments on behalf of Bomarko, Inc. on the proposed Part 70 permit. The summary of the comments and responses is as follows:

Comment #1

Condition A.1 of the Part 70 permit identifies Mr. Ron Harris as the responsible official. Mr. Harris is retiring at the end of 1998. Mr. Kimball L. Mancke, President/Chief Operating Officer will be the responsible official for Bomarko.

Response #1

Condition A.1 of the Part 70 permit is revised to list the correct responsible official as Mr. Kimball L. Mancke, President/Chief Operating Officer.

Comment #2

Condition A.2 of the Part 70 Operating permit includes a list of emission units and pollution control devices at the facility. There was an apparent error in the Permit Application regarding the printing widths of the flexographic printing presses. The printing widths for ID Nos. 1-2-P1, 1-2-P2, 1-2-P7, and 1-2-P9 should be changed from 43.9 inches to 50 inches. The 50-inch print width is consistent with information that was previously submitted to the Department. These same changes need to be made in the similar list of equipment included in section D.1.

In a comment that is related to this same equipment list, Bomarko would like to change the maximum line speeds for several of the presses to allow for additional operation flexibility at the facility. Specifically, Bomarko requests the following changes in maximum line speed: Press No. 1 (ID No. 1-2-P1) to 600 feet per minute, Press No. 2 (ID No. 1-2-P2) to 600 fpm, Press No. 3 (ID No. 1-2-P3) to 800 fpm, Press No. 5 (ID No. 1-2-P5) to 1,200 fpm, Press No. 6 (ID No. 1-2-P6) to 800 fpm, Press No. 8 (ID No. 1-2-P8) to 800 fpm, and Press No. 9 (ID No. 1-2-P9) to 800 fpm. For your information, Press No. 6 vents to a catalytic incinerator, the other presses have been converted to water-based coatings; therefore, Bomarko anticipates minimal changes to emissions. These same changes in maximum line speeds need to be made in the similar list of equipment included in section D.1.

Response #2

The emission calculation spreadsheet for VOC emissions from the Printing Press Operations, Appendix A, page 1 of 3, has been revised to include the correct printing widths and line speeds mentioned above. Because the potential VOC emissions have increased due to the revised maximum capacities, a more stringent limitation on VOC usage must be taken to limit source wide VOC emissions to below 250 tons per year to avoid the requirements of 326 IAC 2-2 (PSD). The source has requested that an overall VOC usage limitation be taken for all the presses, not just for Press 6. Therefore, the VOC emission limit in condition D.1.1(g) is revised to reflect this. The revised part (g) of condition D.1.1 now reads as follows (changes in bold or strikeout):

- (g) To ensure that the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) do not apply, the input of VOC to ~~Press 6 (ID No. 1-2-P6)~~ **the nine (9) presses** and the usage of cleanup solvent for ~~Press 6 (ID No. 1-2-P6)~~ **the nine (9) presses** [the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent] shall be limited to ~~181.14~~ **239.65** tons used per 12 consecutive months period. This limitation will prevent the VOC emissions from the entire source being greater than 249 tons per year. ~~This limitation is based upon the use of a catalytic incinerator with a minimum overall control efficiency of 65%.~~

The equipment lists in condition A.2 and section D.1 of the Part 70 Operating permit have also been revised to reflect the correct printing widths and line speeds.

Comment #3

Condition A.3 - Specifically Regulated Insignificant Activities, includes a partial list of insignificant activities that were identified on Form GSD-10(a) of the Permit Application. It is our understanding that the units identified in this section of the Permit are only emission units that are subject to a regulatory requirement. Please confirm that the other insignificant activities that are identified in the Permit Application do not need to be listed in the Permit.

Response #3

The insignificant activities listed in condition A.3 are the only insignificant activities that have applicable regulatory requirements. The requirements for the natural gas combustion sources and the degreasing operation are listed in section D.3 of the Part 70 Operating permit. Condition C.2 contains the allowable particulate matter emission limit for the trimmer which has a process weight rate less than 100 pounds per hour. All other insignificant activities are listed in the Technical Support Document.

Comment #4

Condition B.11 of the draft Permit requires that an annual compliance certification be submitted by July 1 of each year covering the time period from January 1 to December 31 of the previous year. It is our belief that the first annual compliance certification will be due July 1, 1999, covering the period January 1 to December 31, 1998, the first year that the Permit will be in effect, even though the permit will not be in effect for all of 1998. Please confirm this assumption.

Response #4

The first annual compliance certification is due on July 1 of the year following the first year that the Permit will be in effect. For example, if this Part 70 permit for Bomarko, Inc. is not issued until after January 1, 1999, then the first certification would be due on July 1, 2000, and will cover the period from January 1 to December 31, 1999. If the permit is issued prior to January 1, 1999, then the first certification would be due on July 1, 1999, and would cover the remaining days of 1998.

Comment #5

Condition B.12 requires that a Preventive Maintenance Plan (PMP) be prepared within 90 days after the date of issuance of the Permit. A PMP was submitted with the Part 70 Operating permit application. Please verify that this plan satisfies the requirements of condition B.12.

Response #5

A Preventive Maintenance Plan (PMP) was submitted with the Part 70 permit application for the paper-fired boiler and the catalytic oxidizer controlling VOC emissions from Press 1-2-P6. In the State Rule Applicability section of the TSD, on page 7 of 13, under the paragraph discussing the applicability of 326 IAC 1-6-3 (Preventive Maintenance Plan), it was stated that the PMPs submitted with the permit application has been verified to fulfill the requirements of 326 IAC 1-6-3 and therefore also satisfies the requirements of condition B.12.

Comment #6

Condition C.15 addresses an Emergency Reduction Plan (ERP). An ERP was submitted with the Part 70 Operating Permit application. Please verify that this plan satisfies the requirements of Condition C.15.

Response #6

As stated in the State Rule Applicability section of the TSD, the ERP submitted with the permit application has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans) and therefore also satisfies the requirements of condition C.15.

Comment #7

Condition C.17 requires that a compliance monitoring plan (CMP) be prepared, including a Compliance Response Plan (CRP). The CRP must also be prepared within 90 days of issuance of the Permit. The Part 70 Operating Permit application includes a CMP that was prepared following guidance from IDEM that was available at the time the application was being prepared. The requirements identified under Condition C.17, such as including all of the compliance monitoring and compliance determination requirements of Section D of the Permit and the record keeping requirements found in Sections C and D of the Permit in the CRP, appear to go beyond the original guidance issued by IDEM for preparing CMPs. Additionally, the requirement in condition C.17 to include a CRP appears to be a new requirement not in the original guidance. It is our understanding that the original intention of the CMP was to cover emission units similar to those units addressed by the U.S. EPA's Compliance Assurance Monitoring rule, which would not be applicable for all of the emission units at the facility.

Please verify the intention of condition C.17 and if new guidance has been issued by IDEM on the preparation of CMPs and CRPs. Please provide copies of any such documents. Additionally, please provide clarification on the information that the Department is looking for in Condition C.17(a)(1), which states, "This compliance monitoring plan is comprised of: (1) This condition;..."

Response #7

IDEM has worked with members of the Clean Air Act Advisory Council's Permit Committee, Indiana Manufacturing Association, Indiana Chamber of Commerce and individual applicants regarding the Preventive Maintenance Plan, the Compliance Monitoring Plan and the Compliance Response Plan. IDEM has clarified the preventive maintenance requirements by working with sources on draft language over the past two years. The plans are fully supported by rules promulgated by the Air Pollution Control Board. The plans are the mechanism each permittee will use to verify continuous compliance with its permit and the applicable rules and will form the basis for each permittee's Annual Compliance Certification. Each permittee's ability to verify continuous compliance with its air pollution control requirements is a central goal of the Title V and FESOP permit programs.

The regulatory authority for and the essential elements of a compliance monitoring plan were clarified in IDEM's Compliance Monitoring Guidance, in May 1996. IDEM originally placed all the preventive maintenance requirements in the permit section titled "Preventive Maintenance Plan." Under that section the permittee's Preventive Maintenance Plan (PMP) had to set out requirements for the inspection and maintenance of equipment both on a routine basis and in response to monitoring. Routine maintenance was a set schedule of inspections and maintenance of the equipment. The second was inspection and maintenance in response to monitoring that showed that the equipment was not operating in its normal range. This monitoring would indicate that maintenance was required to prevent the exceedance of an emission limit or other permit requirement. The maintenance plan was to set out the "corrective actions" that the permittee would take in the event an inspection indicated an "out of specification situation", and also set out the time frame for taking the corrective action. In addition, the PMP had to included a schedule for devising additional corrective actions for out of compliance situations that the source had not predicted in the PMP. All these plans, actions and schedules were part of the Preventive Maintenance Plan, with the purpose of maintaining the permittee's equipment so that an exceedance of an emission limit or violation of other permit requirements could be prevented.

After issuing the first draft Title V permits on public notice in July of 1997, IDEM received comments from members of the regulated community regarding many of the draft permit terms, including the PMP requirements. One suggestion was that the corrective action and related schedule requirements be removed from the PMP requirement and placed into some other requirement in the permit. This suggestion was based, in some part, on the desire that a permittee's maintenance staff handle the routine maintenance of the equipment, and a permittee's environmental compliance and engineering staff handle the compliance monitoring and steps taken in reaction to an indication that the facility required maintenance to prevent an environmental problem.

IDEM carefully considered this suggestion and agreed to separate the "corrective actions" and related schedule requirements from the PMP. These requirements were placed into a separate requirement, which IDEM named the Compliance Response Plan (CRP). In response to another comment, IDEM changed the name of the "corrective actions" to "response steps." That is how the present CRP requirements became separated from the PMP requirement, and acquired their distinctive nomenclature.

Other comments sought clarification on whether the failure to follow the PMP was violation of the permit. The concern was that a permittee's PMP might call for the permittee to have, for example, three "widget" replacement parts in inventory. If one widget was taken from inventory for use in maintenance, then the permittee might be in violation of the PMP, since there were no longer three widgets in inventory, as required by the PMP. Comments also expressed a view that if a maintenance employee was unexpectedly delayed in making the inspection under the PMP's schedule, for example by the employee's sudden illness, another permit violation could occur, even though the equipment was still functioning properly.

IDEM considered the comments and revised the PMP requirement so that if the permittee fails to follow its PMP, a permit violation will occur only if the lack of proper maintenance causes or contributes to a violation of any limitation on emissions or potential to emit. This was also the second basis for separating the compliance maintenance response steps from the PMP and placing them in the Compliance Response Plan (CRP). Unlike the PMP, the permittee must conduct the required monitoring and take any response steps as set out in the CRP (unless otherwise excused) or a permit violation will occur.

The Compliance Monitoring Plan is made up of the PMP, the CRP, the compliance monitoring and compliance determination requirements in section D of the permit, and the record keeping and reporting requirements in sections C and D. IDEM decided to list all these requirements under this new name, the Compliance Monitoring Plan (CMP), to distinguish them from the PMP requirements. The section D provisions set out which facilities must comply with the CMP requirement. The authority for the CMP provisions is found at 326 IAC 2-7-5(1), 2-7-5(3), 2-7-5(13), 2-7-6(1), 1-6-3 and 1-6-5.

The Compliance Monitoring Plan (CMP) is consistent with IDEM's Compliance Monitoring Guidance released in May of 1996. The guidance discusses corrective action plans setting out the steps to take when compliance monitoring shows an out of range reading (Guidance, page 13). Some of the terminology has changed, as a result of comments from regulated sources, but the requirements in the permit do not conflict with the guidance. There are no changes in the condition.

Comment #8

Condition C.20(a) references a previous section related to performance testing. This condition should probably reference Section C.9 rather than Section C. In condition C.20(b), relating to alternatives to observations, sampling, maintenance procedures, or record keeping, it appears as though IDEM is asking for the Permittee to either record that the equipment is shut down or perform the observations, monitoring, etc. as required by the permit on equipment that is not operating. Is this a correct interpretation of the intention of the condition?

Response #8

The intention of Condition C.20(b) is that for equipment that is not operating, the Permittee shall either record that the equipment is shut down in place of performing the observations, sampling, maintenance procedures, and record keeping of subsection (a) of the condition, or the Permittee shall perform the observations, sampling, etc. on the equipment even though it is not operating. The results of the monitoring data would most likely indicate that the equipment is not operating. There are no changes in the operation conditions or status of the permit.

Comment #9

Condition C.22(g) requires that reports (quarterly) cover the period commencing on the date of issuance of the Permit and ending on the last day of the reporting period. For the purposes of quarterly reporting, we are assuming that the report period ends on a calendar quarter and not at the end of the 90-day period from the issuance of the Permit. Please verify that this is correct; i.e., please identify the reporting period for quarterly reporting. Record keeping for the plant would be greatly streamlined if reporting could continue on a calendar quarter basis and not an arbitrary "quarter" created by the day the Permit is issued.

Response #9

Quarterly reporting is done on a calendar quarter basis. Therefore, the first quarterly report would cover the period commencing on the date of issuance of the Permit and ending on the last day of the calendar quarter. There are no changes in the operation conditions or status of the permit.

Comment #10

Condition D.1.1(a) outlines the requirements for VOC emissions from the presses, except for Press No. 6. As written, the condition requires that the presses must maintain compliance with 326 IAC 8-5-5(c)(4). We have spent considerable time reviewing the applicability of 326 IAC 8-5-5 and have concluded based on our understanding of the applicability requirements listed under 8-5-1 and 8-5-5, that only Press No. 6 is subject to the requirements under 8-5-5. However, an Agreed Order (Cause No. A-1580) between the State of Indiana and Bomarko stipulated that Press Nos. 3 and 4 operate in compliance with 326 IAC 8-5-5. Specifically for Presses Nos. 3 and 4, it is our understanding from discussions with IDEM, that Bomarko can use any of the "options", such as the use of a water-based ink, identified under 326 IAC 8-5-5(c) and is not limited to only 326 IAC 8-5-5(c)(4). We would like to discuss the applicability of this rule for Presses Nos. 1, 2, 5, 7, 8, and 9. Bomarko is committed to maintaining compliance with the applicable requirements and would like to make sure that we have a common understanding of the applicable requirements for the presses.

Response #10

Upon further review of the applicability of 326 IAC 8-5-5 based on the requirements listed in 326 IAC 8-5-1 and 326 IAC 8-5-5, Presses 1 and 2 are not subject to the rule because they were constructed prior to November 1, 1980, and are located in Marshall County. Although Presses 3 and 4 were also constructed prior to November 1, 1980, and are located in Marshall County, they are subject to 326 IAC 8-5-5 per Agreed Order Cause No. A-1580 which requires them to comply with the rule. Condition D.1.1 does not state the specific compliance method for Presses 3 and 4 but just requires these presses to comply with the rule using one of the methods listed. Presses 5, 7, 8, and 9 are subject to 326 IAC 8-5-5 because they were constructed after November 1, 1980, and are located at a source in existence as of November 1, 1980, with potential VOC emissions of greater than 100 tons per year. Therefore, Presses 3 through 9 must comply with the requirements of 326 IAC 8-5-5. Since Presses 1 and 2 are not subject to this rule, the first sentence of condition D.1.1 is revised to read as follows (changes in bold or strikeout):

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-5-5] [326 IAC 2-2]

Pursuant to 326 IAC 8-5-5, the Permittee may not cause, allow, or permit the operation of ~~any of the nine (9) presses~~ **Presses 1-2-P3, 1-2-P4, 1-2-P5, 1-2-P6, 1-2-P7, 1-2-P8, and 1-2-P9** employing solvent-containing ink unless:

Comment #11

Condition D.1.1(f) states that Press No. 6 is equipped with a catalytic incinerator to achieve compliance with 326 IAC 8-5-5(c)(3). Bomarko requests that it be given the option of achieving compliance with the rule using any of the options identified under 326 IAC 8-5-5(c). In the event that Bomarko elects to use a water-based or high-solids ink on this line that meets the requirements under 326 IAC 8-5-5(c) for such inks, it should not be required to also use the catalytic incinerator for inks that otherwise comply with the regulation.

Response #11

Since 326 IAC 8-5-5(c) states that compliance with the rule may be achieved by any of the several methods listed, Bomarko has the option of using any of those methods to ensure Press No. 6 complies with the rule. Although Bomarko has stated that they are currently using a catalytic incinerator to achieve compliance with the rule, condition D.1.1(f) will be revised to state that Bomarko will be allowed to use any of the other compliance methods listed in the rule as well. The revised condition D.1.1(f) now reads as follows (changes in bold or strikeout):

- (f) A catalytic incinerator shall be used to control VOC emissions from the packaging rotogravure Press 6 (ID No. 1-2-P6) to comply with 326 IAC 8-5-5, and shall maintain at least a 90% VOC destruction efficiency as per (c)(2) above, and a 65% overall control efficiency as per (e)(2) above. **Any of the other compliance methods listed in paragraphs (a) through (e) above may be used to achieve compliance with 326 IAC 8-5-5 for Press 6 as an alternative to the use of the catalytic incinerator.**

Comment #12

Conditions D.1.3 and D.1.4 outline the testing requirements for Press No. 6. Bomarko has conducted two Method 25 tests on the unit in the past and currently conducts annual FID testing of the unit. Is IDEM expecting another Method 25 test upon issuance of this permit? Condition D.1.3 implies that a test needs to be conducted and repeated every 30 months, while condition D.1.4 only requires testing upon startup of a new coating facility or upon changing the method of compliance for an existing facility.

Response #12

Condition D.1.4 states that by May 1, 1997, **or** upon startup of a new coating facility, **or** upon changing the method of compliance for an existing coating facility, the Permittee shall comply with the listed requirements which includes an initial compliance test and then testing no later than every thirty (30) months after the date of the initial test. Therefore, since it is past May 1, 1997, and Press No. 6 is in existence at that time, the Permittee must comply with the requirements of condition D.1.4. If the Permittee does not wish to use Method 25 testing, then an alternative test method must be submitted to the Commissioner for approval.

Comment #13

Condition D.1.6 requires that the catalytic incinerator be used at all times when Press No. 6 is in operation. The condition should be modified to allow for the possible use of water-based or high-solids inks, in compliance with 326 IAC 8-5-5, without the catalytic incinerator.

Response #13

As stated above, since 326 IAC 8-5-5(c) states that compliance with the rule may be achieved by any of the several methods listed, Bomarko has the option of using any of those methods to ensure Press No. 6 complies with the rule. Although Bomarko has stated that they are currently using a catalytic incinerator to achieve compliance with the rule, condition D.1.6 will be revised to state that Bomarko must use the catalytic incinerator at all times when Press No. 6 is in operation unless another compliance method listed in the rule is used. The revised condition D.1.6 now reads as follows (changes in bold):

D.1.6 Volatile Organic Compounds (VOC)

The catalytic incinerator for VOC control shall be in operation at all times when Press 6 (ID No. 1-2-P6) is in operation **unless an alternative compliance method as listed in 326 IAC 8-5-5(c) is used to comply with the requirements of 326 IAC 8-5-5.**

Comment #14

Condition D.2.3 stipulates that the baghouse must be in operation at all times that the boiler is in operation. The baghouse is not required if the unit is burning only natural gas. The condition should be amended to allow the boiler to operate without the baghouse if only natural gas is being burned.

Response #14

Since the baghouse is not necessary for the boiler to be in compliance with 326 IAC 6-2-4 when it is burning only natural gas, condition D.2.3 is revised to state this. The revised condition D.2.3 now reads as follows (changes in bold or strikeout):

D.2.3 Particulate Matter (PM)

The baghouse for PM control shall be in operation at all times when the 3.0 MMBtu per hour paper and natural gas fired boiler is in operation **and burning paper for fuel. It is not necessary for the baghouse to be in operation when the boiler is burning only natural gas for fuel.**

Comment #15

The last paragraph of condition D.2.5 requires that the pressure gauge be calibrated at least once every 6 months. Does IDEM have any guidance available for calibration of pressure drop gauges? Bomarko proposes to zero the gauge as a means of calibration.

Response #15

Guidance for calibration of pressure drop gauges would most likely be available from the pressure gauge manufacturer. Since parametric monitoring of the pressure drop is required for the baghouse controlling PM emissions from the paper-fired boiler, a new condition has been added to section C of the Part 70 operating permit which includes pressure gauge specifications. The new condition C.15 reads as follows:

C.15 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

The original conditions C.15 through C.23 have been re-numbered as conditions C.16 through C.24.

Comment #16

Paragraph (a) of condition D.2.7, Record Keeping Requirements, references documenting compliance with condition D.2.5 by maintaining records of visible emissions. This condition should probably reference condition D.2.4. Similarly, paragraph (b) should probably reference condition D.2.5 rather than D.2.6.

Response #16

Condition D.2.7 did contain a typographical error in referencing conditions D.2.5 and D.2.6 in parts (a) and (b), respectively. These errors have been corrected and the revised condition D.2.7 now reads as follows (changes in bold or strikeout):

D.2.7 Record Keeping Requirements

- (a) To document compliance with Condition ~~D.2.5~~ **D.2.4**, the Permittee shall maintain records of daily visible emission notations of the 3.0 MMBtu per hour paper-fired boiler stack exhaust.
- (b) To document compliance with Condition ~~D.2.6~~ **D.2.5**, the Permittee shall maintain the following:

- (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle: frequency and differential pressure.
 - (2) Documentation of all response steps implemented, per event .
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Upon further review, the OAM has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted).

1. The IDEM now believes that condition B.27 is not necessary and has removed it from the permit. The issues regarding credible evidence can be adequately addressed during a showing of compliance or noncompliance. Indiana's statutes, and the rules adopted under their authority, govern the admissibility of evidence in any proceeding. Indiana law contains no provisions that limit the use of credible evidence and an explicit statement is not required in the permit.

~~B.27 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]
Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non-compliance.~~

2. Condition C.3 (Opacity) has been revised as follows:

~~C.3 Opacity [326 IAC 5-1]
Pursuant to 326 IAC 5-1-2 (Visible Emissions **Opacity** Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), ~~visible emissions opacity~~ shall meet the following, unless otherwise stated in this permit:~~

- (a) ~~Visible Emissions **Opacity**~~ shall not exceed an average of forty percent (40%) ~~opacity in any one (1) six (6) minute averaging period in twenty four (24) consecutive readings,~~ as determined in 326 IAC 5-1-4.

- (b) ~~Visible Emissions Opacity~~ shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings **as measured according to 40 CFR 60, Appendix A, Method 9, or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor**), in a six (6) hour period.

3. Torn or otherwise failed bags can have a dramatic effect on bag house performance and few sources have reliable information that demonstrates that compliance can be achieved when compartments are "on line" with torn bags. Condition D.2.6 has been revised as follows to clarify that the emergency provisions of the Title V rule and the corresponding condition in this permit may take precedence if applicable (changes in bold or strikeout):

D.2.6 Broken ~~or Failed Bag or Failure~~ Detection

In the event that bag failure has been observed.

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. ~~For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.~~ **Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**
- (b) ~~Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.~~ **For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

**Appendix A: Emissions Calculations
VOC From Printing Press Operations**

Company Name: Bomarko, Inc.
Address City IN Zip: 1955 North Oak Road, Plymouth, Indiana 46563
Operating Permit No.: T099-7713
Plt ID: 099-00021
Reviewer: Trish Earls
Date: December 3, 1998

State Potential Emissions (uncontrolled):										
Throughput for Presses:										
Press I.D.		Maximum Line Speed (ft/min)	Convert Feet to Inches	Maximum Print Width (in)	Min/Hour	Hours/Year	1/1,000,000	MMin ² /Year		
1-2-P1		600	12	50.0	60	8760	1,000,000	189,216		
1-2-P2		600	12	50.0	60	8760	1,000,000	189,216		
1-2-P3		800	12	45.0	60	8760	1,000,000	227,059		
1-2-P4		600	12	45.0	60	8760	1,000,000	170,294		
1-2-P5		1,200	12	44.0	60	8760	1,000,000	333,020		
1-2-P6		800	12	32.0	60	8760	1,000,000	161,464		
1-2-P7		800	12	50.0	60	8760	1,000,000	252,288		
1-2-P8		800	12	45.0	60	8760	1,000,000	227,059		
1-2-P9		800	12	50.0	60	8760	1,000,000	252,288		
INK VOCS:										
Ink Name	Ink Density (lb/gal)	Maximum Coverage lbs/MMin ²	Weight % Organics	Flash Off %	Through Put MMin ² /Year	Tons/2,000 lbs	VOC Pounds per Hour	VOC Tons per Year	Weight % Solids	Lb VOC/Lb Solids
Press 1-2-P1										
Water-borne packaging ink 4393	9.55	1.9	8.00%	100.00%	189,216	2,000	3.28	14.38	33.00%	0.24
Waterbase pantone ink 5076	9.7	1.9	7.70%	100.00%	189,216	2,000	3.16	13.84	46.20%	0.17
Press 1-2-P2										
Water-borne packaging ink 4393	9.55	1.9	8.00%	100.00%	189,216	2,000	3.28	14.38	33.00%	0.24
Waterbase pantone ink 5076	9.7	1.9	7.70%	100.00%	189,216	2,000	3.16	13.84	46.20%	0.17
Press 1-2-P3										
Water-borne packaging ink 4393	9.55	1.5	8.00%	100.00%	227,059	2,000	3.11	13.62	33.00%	0.24
Waterbase pantone ink 5076	9.7	1.5	7.70%	100.00%	227,059	2,000	2.99	13.11	46.20%	0.17
Press 1-2-P4										
Water-borne packaging ink 4393	9.55	1.5	8.00%	100.00%	170,294	2,000	2.33	10.22	33.00%	0.24
Waterbase pantone ink 5076	9.7	1.5	7.70%	100.00%	170,294	2,000	2.25	9.83	46.20%	0.17
Press 1-2-P5										
Water-borne packaging ink 4393	9.55	1.9	8.00%	100.00%	333,020	2,000	5.78	25.31	33.00%	0.24
Waterbase pantone ink 5076	9.7	1.9	7.70%	100.00%	333,020	2,000	5.56	24.36	46.20%	0.17
Press 1-2-P6										
Gravure solvent paper F.S. pantone 3098	8	2.2	65.70%	100.00%	161,464	2,000	26.64	116.69	34.30%	N/A
Press 1-2-P7										
Water-borne packaging ink 4393	9.55	1.2	8.00%	100.00%	252,288	2,000	2.76	12.11	33.00%	0.24
Waterbase pantone ink 5076	9.7	1.2	7.70%	100.00%	252,288	2,000	2.66	11.66	46.20%	0.17
Press 1-2-P8										
Water-borne packaging ink 4393	9.55	1.5	8.00%	100.00%	227,059	2,000	3.11	13.62	33.00%	0.24
Waterbase pantone ink 5076	9.7	1.5	7.70%	100.00%	227,059	2,000	2.99	13.11	46.20%	0.17
Press 1-2-P9										
Water-borne packaging ink 4393	9.55	1.6	8.00%	100.00%	252,288	2,000	3.69	16.15	33.00%	0.24
Waterbase pantone ink 5076	9.7	1.6	7.70%	100.00%	252,288	2,000	3.55	15.54	46.20%	0.17
Total State Potential Emissions:							80.32	351.78		
Federal Potential Emissions (controlled):										
					Overall Material Usage Limitation	1-2-P6 Incinerator Control Efficiency	Controlled VOC Pounds per Hour	Controlled VOC Tons per Year		
Total Federal Potential Emissions:						88.19%	68.60%	54.71	239.65	

Note:

Heatsset offset printing has an assumed flash off of 80%. Other types of printers have a flash off of 100%

None of the above inks contain hazardous air pollutants (HAPs).

All of the above inks, except for the ink used in Press 1-2-P6, are in compliance with the limit pursuant to 326 IAC 8-5-5 of 0.5 lbs of VOC per lb of solids.

Press 1-2-P6 will comply with 326 IAC 8-5-5 by using a catalytic incinerator to control VOC emissions. An additional material usage limitation of 88.19% in all presses will limit VOC emissions from the printing operation so that source wide VOC emissions are less than 250 tons per year, therefore, the requirements of 326 IAC 2-2 (PSD) do not apply.

Methodology:

Throughput = Maximum line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8,760 hours per year = MMin² per Year

VOC = Maximum Coverage pounds per MMin² * Weight percentage organics (volatiles minus water) * Flash off * Throughput * Tons per 2,000 pounds = Tons per Year

Pound VOC per pound Solid = (Density (lb/gal) * Weight percentage organics) / (Density (lb/gal) * Weight % Solids)

Controlled Emissions = Uncontrolled Emissions * Material Usage Limitation

**Appendix A: Emission Calculations
Natural Gas and Paper Combustion
MM Btu/hr < 100**

Company Name: Bomarko, Inc.
Address City IN Zip: 1955 North Oak Road, Plymouth, Indiana 46563
Operating Permit No.: T099-7713
Plt ID: 099-00021
Reviewer: Trish Earls
Date: July 28, 1998

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Paper Throughput ton/yr
3.0	26.3	5652.0

Heat Input Capacity includes:
one (1) paper-fired boiler using natural gas.

	PM	PM10	SO2	NOx	VOC	CO
N.G. Combustion Emission Factor in lb/MMCF (1)	7.6	7.6	0.6	100.0	5.5	84.0
Paper Combustion Emission Factor in lb/ton (2)	7.0	7.0	2.5	3.0	3.0	10.0
Potential Emissions in tons/yr	19.88	19.88	7.07	9.79	8.55	29.36
Controlled Emissions in tons/yr (3)	1.99	1.99	7.07	9.79	8.55	29.36

Methodology:

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

(1) Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 50, Flue gas recirculation = 32

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1 and 1.4-2, SCC #1-03-006-03

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

(2) Emission factors are from AP 42 Table 2.1-12 Uncontrolled emission factors for industrial/commercial refuse combustors, multiple chambers

Emissions (tons/yr) = Throughput (ton/yr) * Emission Factor (lb/ton) * ton/2000 lbs

(3) PM emissions are controlled by a woven fiberglass fabric baghouse with a 90% control efficiency.

**Appendix A: Emission Calculations
Natural Gas Combustion (Insignificant Activities)
MM Btu/hr < 100**

Company Name: Bomarko, Inc.
Address City IN Zip: 1955 North Oak Road, Plymouth, Indiana 46563
Operating Permit No.: T099-7713
PIt ID: 099-00021
Reviewer: Trish Earls
Date: July 28, 1998

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
33.1	290.0

Heat Input Capacity includes:
 Natural gas combustion units classified as Insignificant Activities

	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0	5.5	84.0
Potential Emission in tons/yr	1.10	1.10	0.09	14.50	0.80	12.18

Methodology:

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 50, Flue gas recirculation = 32

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1 and 1.4-2, SCC #1-03-006-03

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton